



Order Filed on August 10, 2020
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

RAS Citron, LLC
130 Clinton Road, Lobby B, Suite 202
Fairfield, NJ 07004
Telephone: 973-575-0707
Facsimile: 973-404-8886
Attorneys for Secured Creditor

Harold N. Kaplan (HK-0226)

In Re:

Clifford Carter,

Debtor,

Regina Carter fka Regina Collins

fka Regina Spring Carter,

Joint Debtor.

Case No.: 19-28930-ABA


Chapter: 13

Judge: Andrew B. Altenburg Jr.

**AGREED ORDER RESOLVING SECURED CREDITOR'S MOTION FOR RELIEF
FROM THE AUTOMATIC STAY**

The relief set forth on the following pages, numbered two (2) through three (3), is hereby
ORDERED.

DATED: August 10, 2020



Honorable Andrew B. Altenburg, Jr.
United States Bankruptcy Court

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Secured Creditor: U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR
STRUCTURED ASSET SECURITIES CORPORATION MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2006-W1

Secured Creditor's Counsel: RAS CITRON, LLC

Debtors' Counsel: Mark W Ford

Property Involved ("Collateral"): 504 E Godfrey Avenue, Philadelphia, Pennsylvania 19120

Relief sought: ■ Motion for relief from the automatic stay
 □ Motion to dismiss
 □ Motion for prospective relief to prevent imposition of automatic stay
 against the collateral by debtor's future bankruptcy filings

For good cause shown, it is **ORDERED** that Applicant's Motion(s) is (are) resolved, subject to
the following conditions:

1. Status of post-petition arrearages:

- The Debtor is overdue for 05 months from 03/01/2020 through 07/01/2020.
- The Debtor is overdue for 05 payments from 03/01/2020 through 07/01/2020 at
\$1,378.07 per month.

Funds Held In Suspense \$0.00.

Total Arrearages Due \$6,890.35.

2. Debtor must cure all post-petition arrearages, as follows:

- Beginning on 08/01/2020, regular monthly mortgage payments shall
continue to be made in the amount of \$1,378.07.
- Beginning on 08/15/2020, monthly cure payments shall be made in the amount of
\$1,148.40 for 05 months. A 6th and final payment shall be made in the amount of
\$1,148.35 on or before 01/15/2021.

3. Payments to the Secured Creditor shall be made to the following address(es):

■ Regular monthly payment: PHH Mortgage Services
Mailstop SBRP
PO Box 5469
Mt. Laurel, NJ 08054

■ Monthly cure payment: PHH Mortgage Services
Mailstop SBRP
PO Box 5469
Mt. Laurel, NJ 08054

4. In the event of Default:

■ Should the Debtor(s) fail to make any of the above captioned payments, or if any regular monthly mortgage payment should become more than thirty (30) days late or if Debtor(s) fails to comply with any terms of this Consent Order, counsel shall file a Certification of Default with the Court. A copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

■ In the event the Debtor(s) convert(s) to a Chapter 7 during the pendency of this bankruptcy case, the Debtor(s) shall cure all arrears within ten (10) days from the date of conversion in order to bring the loan contractually current. Should the Debtors fail to bring the loan contractually current, counsel shall file a Certification of Default with the Court, a copy of the Certification shall be sent to the Chapter 13 Trustee, Chapter 7 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

■ This agreed order survives any loan modification agreed to and executed during the instant bankruptcy. If any regular mortgage payment due after the execution of a loan modification is more than thirty (30) days late, counsel shall file a Certification of Default with the Court a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

5. Award of Attorneys' Fees:

- The Applicant is awarded attorney fees of \$350.00 and costs of \$181.00.

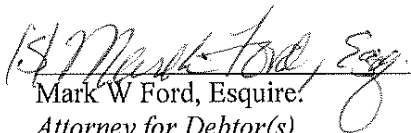
The fees and costs are payable:

- Through the Chapter 13 plan.

☐ To the Secured Creditor within _____ days.

☐ Attorneys' fees are not awarded.

The undersigned hereby consent to the form and entry of the foregoing order.


Mark W Ford, Esquire.
Attorney for Debtor(s)
Date:

/s/ Harold N. Kaplan

Harold N. Kaplan, Esquire.
Attorney for Secured Creditor
Date: 8/10/2020

Certificate of Notice Page 5 of 5

United States Bankruptcy Court
District of New JerseyIn re:
Clifford Carter
Regina Carter
DebtorsCase No. 19-28930-ABA
Chapter 13**CERTIFICATE OF NOTICE**

District/off: 0312-1

User: admin
Form ID: pdf903Page 1 of 1
Total Noticed: 1

Date Rcvd: Aug 10, 2020

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Aug 12, 2020.
db/jdb +Clifford Carter, Regina Carter, 12 Robin Lane, West Berlin, NJ 08091-9101

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
NONE. TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Aug 12, 2020

Signature: /s/Joseph Speetjens**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on August 10, 2020 at the address(es) listed below:

Aleisha Candace Jennings on behalf of Creditor New Residential Mortgage LLC
ajennings@rasflaw.com
Denise E. Carlon on behalf of Creditor THE BANK OF NEW YORK MELLON FKA THE BANK OF NEW YORK,
AS TRUSTEE et al... dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com
Elizabeth L. Wassall on behalf of Creditor U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR
STRUCTURED ASSET SECURITIES CORPORATION MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2006-W1
ewassall@logs.com, njbankruptcynotifications@logs.com
Harold N. Kaplan on behalf of Creditor Ditech Financial LLC hkaplan@rasnj.com,
informationathnk@aol.com
Harold N. Kaplan on behalf of Creditor U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR
STRUCTURED ASSET SECURITIES CORPORATION MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2006-W1
hkaplan@rasnj.com, informationathnk@aol.com
Harold N. Kaplan on behalf of Creditor U.S. Bank National Association, as Trustee for
Structured Asset Securities Corporation Mortgage Pass-Through Certificates, Series 2006-W1
hkaplan@rasnj.com, informationathnk@aol.com
Harold N. Kaplan on behalf of Creditor U.S. Bank National Association hkaplan@rasnj.com,
informationathnk@aol.com
Isabel C. Balboa ecfmail@standingtrustee.com, summarymail@standingtrustee.com
Isabel C. Balboa on behalf of Trustee Isabel C. Balboa ecfmail@standingtrustee.com,
summarymail@standingtrustee.com
Kevin Gordon McDonald on behalf of Creditor THE BANK OF NEW YORK MELLON FKA THE BANK OF NEW
YORK, AS TRUSTEE et al... kmcdonald@kmlawgroup.com, bkgroup@kmlawgroup.com
Mark W Ford on behalf of Joint Debtor Regina Carter markfordlaw@juno.com,
reginaperfettit@gmail.com
Mark W Ford on behalf of Debtor Clifford Carter markfordlaw@juno.com,
reginaperfettit@gmail.com
Robert Davidow on behalf of Creditor U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR
STRUCTURED ASSET SECURITIES CORPORATION MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2006-W1
nj.bkecf@fedphe.com
U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 14